

**REMARKS/ARGUMENTS**

In the specification, the paragraphs [0004] and [0030] have been amended to correct the minor typographical errors noted by the Examiner. All other claims remain unamended.

Claim 8 has been amended to correct a minor typographical error noted by the Examiner. Following entry of the amendment, claims 1-25 remain pending in the application.

In the Office Action of November 28, 2005, the Examiner rejected claims 1-3, 5-11, 13-17, 19, and 20 under 35 U.S.C. 102(e) as being anticipated by US Patent No. 6,870,535 (Hill et al.). The Examiner also rejected claims 4, 11, and 18 under 35 U.S.C. 103(a) as being obvious having regard to Hill et al. Finally, the Examiner rejected claims 21-25 under 35 U.S.C. 103(a) as being obvious having regard to Hill et al. in view of US Patent No. 6,043,826 (Manning).

The Applicant has carefully considered the Examiner's rejections, but respectfully traverses those rejections for the reasons that follow. In particular, the Applicant respectfully submits that the Examiner has failed to make out a case of anticipation based on Hill et al. since Hill et al. fails to teach significant limitations found in the claim language of the present application. Furthermore, the Applicant respectfully submits that the Examiner has failed to make out a *prima facie* case of obviousness based upon Hill et al. or Hill et al. in view of Manning.

The present invention discloses a method of rendering text on an output device. In particular, the present invention describes a method in which a character set for a custom font is stored in an image file and individual characters are selected, e.g. clipped, from the image file for rendering on a display to output a text string. By storing more than one character in a single image file, the present invention avoids the overhead associated with storing a separate image file for each character in the character set. The present invention also avoids the complex code and processing associated with rendering a vector-based font. As defined in the independent claims of the present application, the method

described in the present application includes an image file defining an image of a custom character set and steps of locating a selected character from the custom character set within the image, defining a portion of the image that contains the selected character and rendering that portion on the output device.

The Hill et al. reference describes a tool for creating a custom font set. This is the type of tool referred to in paragraph [0004] of the present specification. The Hill et al. reference describes a tool for building, defining, and manipulating individual characters of a custom font. As noted at column 3, lines 19-33, a glyph is a description of the visual appearance of a character within a font. The glyph is composed of one or more graphical objects which together form a tree structure as shown in Figure 1. At column 3, lines 38-46, Hill et al. explain that each graphical object typically includes various information components used in the reproduction of the glyph or font, including primitives. Primitives may be formed in a number of ways and are used to characterize an object shape. As an example, Hill et al. suggest cubic spline paths may be used to define the shape of an object. As a further example, Hill et al. suggest that image data in the form of a pixel map may define the shape. Accordingly, Hill et al. have suggested that a glyph may be composed of a number of graphical objects, some of which may include pixel maps defining portions of the glyph. In other words, Hill et al. have suggested building a glyph based upon multiple images.

This understanding of Hill et al. is further emphasized at column 5, lines 19-21, which state that the structure of a font from the user's point-of-view is as a collection of graphic objects, of which there at least one per glyph.

The Hill et al. reference goes on to describe various mechanisms for manipulating characters through changing various attributes so as to build a custom font set. The Hill et al. reference nowhere suggests the storage of a custom character set in an image file. Hill et al. presume no more than one character would be contained in a single file. In fact, Hill et al. suggest the stitching together of various images to create a single character.

Since Hill et al. fail to teach or suggest defining a custom character set as an image in an image file, Hill et al. also fail to suggest steps of locating a selected character within the custom character set, defining a portion of the image containing the selected character, and rendering that portion on an output device.

Accordingly, the Hill et al. reference fails to teach or suggest many limitations found in the independent claims of the present application. Therefore, the applicant respectfully submits that the Hill et al. reference cannot be considered anticipatory and respectfully requests that the Examiner withdraw the rejection under 35 U.S.C. 102(e).

With respect to the Examiner's rejection under 35 U.S.C. 103(a) based upon Hill et al., the applicant respectfully notes that the Hill et al. reference is directed to a tool for defining and manipulating complex custom characters in the course of designing a custom font. This is not the issue addressed by the present application, which is directed to a method of rendering a predefined custom font in a manner that reduces the overhead associated with storing and/or processing the custom font. The Hill et al. reference is directed to an entirely different problem than the problem addressed by the present application. Accordingly, the applicant respectfully submits that the Hill et al. reference may be considered non-analogous art. Alternatively, the applicant respectfully submits that the Hill et al. reference is far enough removed from the problem addressed by the present application that it fails to provide any suggestion or motivation to modify its teachings in the manner suggested by the Examiner. Moreover, modification of the Hill et al. teachings to fall within the scope of the claims of the present application would render the Hill et al. system inapplicable for its purpose. Accordingly, the applicant respectfully submits that the Examiner has failed to establish a *prima facie* case of obviousness based upon the Hill et al. reference.

The Manning reference is relied upon by the Examiner to supply the context of rendering characters on the display of a handheld mobile personal device. The Manning reference in no way cures the deficiencies in the teachings of Hill et al. outlined above. Accordingly, the applicant respectfully submits that the Manning reference fails to bolster the Examiner's

obviousness rejections and that the rejections based upon Hill et al. in view of Manning fail to establish a *prima facie* case of obviousness. Therefore, the applicant respectfully requests that these rejections also be withdrawn.

In view of the foregoing amendments and submissions, the applicant respectfully requests that the Examiner withdraw his rejections and reconsider the present application. The applicant respectfully solicits a timely Notice of Allowance.

Should the Examiner be inclined to maintain the prior art rejections in spite of the foregoing arguments, the applicant respectfully requests a telephone interview to discuss the basis for the Examiner's rejections and to clarify the arguments presented. Should the Examiner wish to discuss the foregoing amendments or arguments, he is invited to telephone the applicant's agent, Fraser Rowand at (416) 868-1482.

Respectfully Submitted,

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